

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

**UNITED STATES OF AMERICA**

**v.**

**MEAH VIRGE**

**Case No. 1:17-CR-076-2**

**JUDGE BARRETT**

**GOVERNMENT'S RESPONSE IN  
OPPOSITION TO DEFENDANT'S  
MOTION FOR BOND**

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Comes now the United States, by and through counsel, and for the government's response in opposition to Meah Virge's (Virge) Motion for Pretrial Release, respectfully states as follows:

Virge was indicted by the Grand Jury in a five-count Indictment. If convicted, Virge would face a mandatory twenty-year term of imprisonment based on the allegation that narcotics sold by Virge and her co-defendant caused serious physical injury to another individual. In addition, the Grand Jury indicted Virge for operating a drug involved premises. (R. 1, Indictment.) Based on these charges, it is presumed Virge be detained. *See* 18 U.S.C. § 3142(e)(2).

On August 21, 2017, Magistrate Judge Karen L. Litkovitz entered a detention order related to Virge's request for release. (R. 25, Detention Order.) The Magistrate Judge found that Virge had not rebutted the presumption that she be detained pending trial. Specifically, the Magistrate Judge found after a review of the Pretrial Services Report, which also recommended detention pending trial, that Virge posed "a risk of nonappearance at court proceedings, and by clear and convincing evidence that the defendant's release would pose a risk of harm to the public." (R. 25, Detention Order.) Additionally, the Magistrate Judge found "that the defendant has a criminal history that includes offenses of violence; has violated the conditions of probation, parole, or supervised release previously imposed by the court; is subject to a lengthy period of incarceration if convicted; while on state bond (for the instant alleged offense) incurred new assault and drugs

charges which are still pending; has failed to appear for court proceedings in the past; and [other] conditions ... will not sufficiently ameliorate the risks posed if the defendant is released.” *Id.*

Virge has not rebutted the presumption that she be detained pending trial and has not presented this Honorable Court with any additional information with which it could reasonably rely upon to order her release.

Therefore, the United States respectfully requests this Court deny Virge’s Motion for Bond.

Respectfully submitted,

BENJAMIN C. GLASSMAN  
United States Attorney

*s/Christy L. Muncy*

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#### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Response in Opposition to Defendant’s Motion for Pretrial Release was filed with the Court’s CM/ECF System this day, October 23, 2017, which provides electronic notice to all parties.

*s/Christy L. Muncy*

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CHRISTY L. MUNCY (KY 88236)  
Assistant United States Attorney